

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL No. 2804  
Case No. 17-md-2804  
Judge Dan Aaron Polster

**This document relates to:**

*The County of Cuyahoga v. Purdue  
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.  
Purdue Pharma L.P. et al.,  
Case No. 18-OP-45090*

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**DECLARATION OF TIMOTHY W. KNAPP REGARDING  
REPLY IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE  
MEREDITH ROSENTHAL'S OPINIONS AND PROPOSED TESTIMONY**

I, Timothy W. Knapp, declare as follows:

1. I am an attorney at Kirkland & Ellis LLP, counsel for Defendants Allergan Finance, LLC, Allergan plc, Allergan Sales, LLC, and Allergan USA, Inc. in the above captioned case.
2. I submit this declaration regarding the Reply in Support of Defendants' Motion to Exclude Meredith Rosenthal's Opinions and Proposed Testimony.
3. Attached as Exhibit 1 is a true and correct copy of the Qi, "The Impact of Advertising Regulation on Industry: The Cigarette Advertising Ban of 1971," RAND Journal of Economics 44, no. 2 (2013).
4. Attached as Exhibit 2 is a true and correct copy of the May 10, 2019 Expert Report of Robin Cantor, Ph.D.
5. Attached as Exhibit 3 is a true and correct copy of the May 10, 2019 Expert Report of Henry Grabowski, Ph.D.

6. Attached as Exhibit 4 is a true and correct copy of Conti *et al.*, “Generic prescription drug price increases: which products will be affected by proposed anti-gouging legislation?,” *Journal of Pharmaceutical Policy and Practice* 11 no. 1 (2018);

7. Attached as Exhibit 5 is a true and correct copy of the Meara. *et al.*, “State and Federal approaches to health reform: What works for the working poor?,” *National Bureau of Economic Research* (2008).

8. Attached as Exhibit 6 is a true and correct copy of the Pandya *et al.*, “Cost-effectiveness of Financial Incentives for Patients and Physicians to Manage Low-Density Lipoprotein Cholesterol Levels,” *JAMA Network* 1 no. 5 (2018).

9. Attached as Exhibit 7 is a true and correct copy of an excerpt of Murray, “Econometrics: A Modern Introduction,” (2006).

10. Attached as Exhibit 8 is a true and correct copy of Angrist & Krueger, “Instrumental Variables and the Search for Identification: From Supply and Demand to Natural Experiments,” (2001).

Dated: August 16, 2019

Respectfully submitted,

/s/ Timothy W. Knapp

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*Attorney for Defendants Allergan Finance, LLC f/k/a/*  
*Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.;*  
*Allergan Sales, LLC; Allergan USA, Inc.; and specially*  
*appearing Defendant Allergan plc f/k/a Actavis plc*

**CERTIFICATE OF SERVICE**

I, Donna M. Welch, hereby certify that on August 29, 2019 the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ *Donna M. Welch* \_\_\_\_\_

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